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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

LISA RAMOS,

Plaintiff,

vs.

KILOLO KIJAKAZI,
 Acting Commissioner of Social Security,

Defendant.

CIVIL NO. 4:21-cv-06277-KAW

**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO FILE
 CROSS-MOTION FOR SUMMARY
 JUDGMENT AND IN OPPOSITION
 TO PLAINTIFF’S MOTION FOR
 SUMMARY JUDGMENT**

IT IS HEREBY STIPULATED, by and between Lisa Ramos (Plaintiff) and Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Defendant shall have an extension of time of 35 days to deliver her Cross-Motion for Summary Judgment and in Opposition to Plaintiff’s Motion for Summary Judgment. The current due date is March 17, 2022. The new due date will be April 21, 2022. The parties further stipulate that all other dates will be extended accordingly.

This is Defendant’s first request for an extension, and it is made with good cause. Defendant’s of counsel attorney has worked diligently to meet the timelines provided by the Court but has been prevented from doing so by her busy schedule. Defendant’s of counsel attorney has seventy-one other Stip. & Order for Ext; 4:21-cv-06277-KAW 1

1 active cases and 29 due dates in the next 60 days including one Ninth Circuit answering brief.
2 Additionally, Defendant's of counsel attorney has other responsibilities with another practice group in
3 her office where the work cannot be extended. Defendant requests this extension in good faith, and with
4 no intent to delay these proceedings unnecessarily. Defendant apologizes to the Court for any
5 inconvenience caused by this delay.
6

7 WHEREFORE, Defendant requests until April 21, 2022, to deliver her Cross-Motion for
8 Summary Judgment and in Opposition to Plaintiff's Motion for Summary Judgment

9 Respectfully submitted,

10 Dated: February 28, 2022

11 By: /s/ Harvey Peter Sackett
12 HARVEY PETER SACKETT
13 Sackett and Associates
14 Attorney for Plaintiff

15 Dated: February 28, 2022

16 STEPHANIE HINDS (CSBN 154284)
17 United States Attorney

18 By: /s/ Margaret Lehrkind
19 MARGARET LEHRKIND
20 Special Assistant United States Attorney

21 Attorneys for Defendant

22 IT IS SO ORDERED:

23 Kandis Westmore
24 THE HONORABLE KANDIS A. WESTMORE
25 UNITED STATES MAGISTRATE JUDGE

26 DATE: March 1, 2022
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